

John R. Kasish, Governor Mary Taylor, Lt. Governor Craig W. Butler, Director

July 2, 2014

Mr. Bruce Bailey Vice President of Technical Affairs quasar energy group 5575 Granger Road, Ste. 320 Independence, OH 44131

Re: Biosolids Site Review Dovetail Energy, LLC

Dear Mr. Bailey:

Ohio EPA received a request on June 16, 2014 from quasar energy group, to include the following sites as part of the Dovetail Energy, LLC biosolids management program:

Field ID	<u>Ohio EPA Site#</u>	County	<u>Township</u>
GRQ-01-11	29-00405	Greene	Bath
GRQ-01-13	29-00406	Greene	Bath
GRQ-01-14	29-00407	Greene	Bath

These sites, owned by **Exercise** and operated by Pitstick Pork Farms, Inc. are located north of Yellow Springs Fairfield Road and approximately ¾ mile west of West Enon Road.

A review of these sites was conducted by Ohio EPA. Consideration was given to soil and landscape characteristics, isolation distances from residences, geology and ground water conditions and the proximity to waterways and wells.

The review indicated soils at this site that are classified as frequently flooded during the months of October through May. Ohio Administrative Code (OAC) 3745-40-08(D)(3) requires that the beneficial use of biosolids be limited to same day incorporation or injection on areas of beneficial use sites that are frequently flooded during periods when flooding is expected.

The site review also indicated slopes that are greater than 15 percent on portions of these fields. OAC 3745-40-08(D)(4) states that biosolids shall not be beneficially used when the ground slope exceeds 15 percent (or 20 percent for pasture land) unless same day incorporation or injection is performed.

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These sites are authorized to be included as part of the Dovetail Energy biosolids program. This authorization is subject to conditions contained in both the NPDES permit and Ohio Administrative Code (OAC) 3745-40. Conditions contained in the NPDES permit and OAC 3745-40 may differ. In such cases, the more restrictive conditions from either the NPDES permit or OAC 3745-40 shall govern.

Highlights of these conditions are as follows:

- 1. Biosolids shall not be applied in buffer zones.
- 2. In accordance with federal/state rules, biosolids may not be applied within 33 feet of surface waters of the state.
- 3. Biosolids application shall be timed to avoid periods of excessive wetness to help prevent runoff from a site.
- 4. Records for the application of biosolids on these sites shall be maintained in accordance with the requirements found in OAC 3745-40-09(C).

All biosolids beneficially used at these sites shall be injected beneath the surface of the ground or immediately incorporated into the soil.

If you have any questions, please contact me at (614) 644-2150 or via email at betsy.vanwormer@epa.ohio.gov.

Betsy P. L. Van Wormer

Betsy P. L. VanWormer, P.E. Environmental Engineer II

Ohio EPA Division of Surface Water

Cc: Greene County Combined Health District Greene County Soil and Water Conservation District

Bath Township Trustees

Ec: Pitstick Pork Farms Sam Mullins, quasar

Joe Reynolds, Ohio EPA, DSW/SWDO



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